| UNITED STATES DISTRICT COURT | |
|---|-----------------------|
| EASTERN DISTRICT OF NEW YORK | |
| x | |
| : KRISTIE PAGAN, ESTHER ALEXANDER, BRIDGETT HERRERA, VELICIA MATA, and : ASHLEY SULLIVAN, individually and as parents | |
| and natural guardians of their minor children and on: | |
| behalf of all others similarly situated, | |
| Plaintiffs, | 2:10-cv-04676-ADS-WDW |
| - against - | |
| ABBOTT LABORATORIES, INC., | |
| Defendant. | |

JOINT STIPULATION AND MOTION FOR PAGE-LIMIT EXTENSIONS

WHEREAS, on March 23, 2012, Plaintiffs in the above-captioned matter filed a Motion for Class Certification (Dkt. No. 49); and

WHEREAS, pursuant to the Court's order dated April 2, 2012 (Dkt. No. 52), Defendant's memorandum in opposition is due on May 9, 2012; and

WHEREAS "[a] district court's ruling on the [class] certification issue is often the most significant decision rendered in [a] class-action proceeding[]," *Deposit Guaranty Nat'l Bank v. Roper*, 445 U.S. 326, 339 (1980); and

WHEREAS, by May 9, 2012, the parties will have conducted extensive class-certification discovery, including the production of over a million pages of Defendant's documents and the taking of ten depositions; and

WHEREAS Defendant wishes, in addition to responding fully to the arguments raised by Plaintiffs' opening memorandum, among other things, to adequately apprise the Court of the results of this class-certification discovery; and

WHEREAS Plaintiffs have consented to a five-page enlargement of the page limit of

Defendant's opposition memorandum, in exchange for a reciprocal five-page enlargement of the

page limit of Plaintiffs' reply memorandum; and

WHEREAS neither party has previously requested a page-limit extension in this action;

THEREFORE, the parties respectfully move this Court for a five-page enlargement of the

page limits that would otherwise apply to Defendants' memorandum in opposition to Plaintiffs'

Motion for Class Certification and to Plaintiffs' reply memorandum in further support of their

Motion for Class Certification.

Dated: New York, New York

April 23, 2012

PATTERSON BELKNAP WEBB & TYLER LLP

By: /s/ John D. Winter

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SO ORDERED:

Hon. Arthur D. Spatt, U.S. District Judge

2

CERTIFICATE OF SERVICE

I, John D. Winter, of Patterson Belknap Webb & Tyler LLP, hereby state that, on April 23, 2012, I caused the above document to be filed on the following individuals by the methods hereinafter indicated:

Steven Bennett Blau Blau, Brown & Leonard, LLC jasontbrown@bbpc-law.com 224 West 30th Street, Suite 809 New York, NY 10001 Telephone: (212) 725-7272 Attorneys for Plaintiffs

Via ECF